REMARKS

Amendments to the specification

Paragraph [0012] of the specification has been amended, without prejudice, keeping in mind the comments offered by the Examiner. Applicant submits that the objection to the specification has been successfully overcome.

Amendments to the claims

Claims 1 and 15 has been amended to more explicitly and correctly express the present invention. New claims 14-19 are added.

Claim Rejections – 35 USC § 103

Claims 1-3, 7-10, and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Lai (US Patent No. 5593551) in view of Kulkarni et al. (US Patent No. 6283357).

With regard to claims 1-3, 7-10, and 15:

Amended claim 1 recites, in part:

> "A method of manufacturing an electromagnetic interference shield comprising the steps of:
>
> (1) **preparing a substrate and a plurality of target modules** and mounting the substrate and the plurality of target modules in a sputtering chamber, wherein each target module has a target bonded thereto, and said target is made from an electrically conductive material; ...
>
> (4) applying to a voltage to the target module using a power supply, thus **sequentially activating** a magnetron sputtering

process between the respective target modules and the substrate, and thereby **sequentially depositing** a plurality of **electrically conductive layers** from the target modules **onto the substrate** until a desired thickness is achieved on the substrate." (Emphasis added.)

In response of this rejection, applicant has amended claim 1, and respectfully submits that neither Lai nor Kulkarni et al. discloses or suggests that **a plurality of target modules are mounted** in the sputtering chamber, and **magnetron sputtering processes** between the respective target modules and the substrate **are sequentially activated**, as per amended claim 1. In the method of Lai, only one target 70 is mounted in the chamber 20 (Col. 6, lines 27-28), and only one distinct sputtering layer can be formed on the wafer 70. Therefore, the method of amended claim 1 nor the structure yielded by such a method is not taught or suggested by Lai. Additionally, the method disclosed by amended claim 1 uses a plurality of target modules, and the target modules can be sequentially used to form different sputtering layers on the substrate. Thus, the method of amended claim 1 is more advanced than the method of Lai and thus is neither taught nor suggested by Lai.

On the other hand, Kulkarni et al "provides a clad HCM sputter target having a sheet of lightweight and/or inexpensive ... cladding material bonded to a plate of sputter target material ..." (Column 2, lines 14-16). Kulkarni et al **does not address the use of multiple such targets**, instead only being concerned with the production of individual such targets. Thus, Kulkarni et al fails to teach or suggest the use of a plurality of targets and/or the sequential activation thereof to result in a plurality of layers being formed on a substrate, as per amended claim 1.

Thus, Kulkarni et al. is unable to overcome the shortcomings, set forth above, with respect to Lai.

Therefore, the method of amended claim 1 is submitted to be novel and unobvious over Lai, Kulkarni et al., or any of the other cited references, taken alone or in combination, and withdrawal of the rejections and allowance of the claim 1 is respectfully requested.

Claims 2, 3 and 7-10 depend on allowable claim 1, and should also be allowable since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 2, 3 and 7-10 are respectfully requested.

Amended Claim 15 recites, in part:

> "A method of manufacturing an electromagnetic interference shield comprising the steps of:
>
> (1) **preparing a substrate and a plurality of target modules** and mounting the substrate and the plurality of target modules in a sputtering chamber, wherein each target module has a target bonded thereto, and said target is made from an electrically conductive material; ...(3) applying to a voltage to the target module using a power supply, thus **sequentially activating** a magnetron sputtering process between the respective target modules and the substrate, and thereby **sequentially depositing** a plurality of **electrically conductive layers** from the target modules **onto the substrate** until a desired thickness is achieved on the substrate."

Similarly to claim 1, applicant has amended the claim 15 and respectfully submits, for the same reasons set forth above, that neither Lai

nor Kulkarni et al. discloses or suggest that a plurality of target modules are mounted in the sputtering chamber and/or that magnetron sputtering processes between the respective target modules and the substrate are sequentially activated, as per amended claim 15. Therefore, the method of amended claim 15 is not taught or suggested by Lai, Kulkarni et al., or any of the other cited references, taken alone or in combination. Therefore, the method of amended claim 15 is submitted to be novel and unobvious Lai in view of Kulkarni et al., and withdrawal of the rejections and allowance of the claim 15 is respectfully requested.

Claims 4 and 5 are rejected under 35 U.S.C. §103(a) as being unpatentable over Lai in view of Kulkarni et al. as applied to claim 1, further in view of Heeks et al. (US Patent No. 6559593).

With regard to claims 4 and 5:

Claims 4 and 5 directly depend on allowable claim 1 and should also be allowable since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 4 and 5 are respectfully requested.

Claim 6 is rejected under 35 U.S.C. §103(a) as being unpatentable over Lai in view of Kulkarni et al. as applied to claim 1, further in view of Harada et al. (US Patent No. 6803098) and Chiang et al. (US Patent No. 6893541).

With regard to claim 6:

Claim 6 directly depends on allowable claim 1 and should also be allowable since it includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claim 6 are

respectfully requested.

Claims 11 and 12 are rejected under 35 U.S.C. §103(a) as being unpatentable over Lai in view of Kulkarni et al. as applied to claim 1, further in view of Hata (US Patent No. 4971674).

With regard to claims 11 and 12:

Claims 11 and 12 depend on allowable claim 1 and should also be allowable since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 11 and 12 are respectfully requested.

Claims 13 and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Lai in view of Kulkarni et al. as applied to claim 1, further in view of Harada et al..

With regard to claims 13 and 14:

Claims 13 and 14 depend on allowable claim 1 and should also be allowable since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 13 and 14 are respectfully requested.

New claims 16-19

Applicant submits that none of the cited references, taken alone or in combination, discloses, teaches, or otherwise suggests the invention, as currently set forth in new claims 16-19. Claims 16-19 should also be patentable under 35 U.S.C. 103 over Lai, Kulkarni et al, or any of the other cited references, taken alone or in combination.

In view of the foregoing, the present application as claimed in the pending claims is considered to be in a condition for allowance, and an

action to such effect is earnestly solicited.

Respectfully submitted,
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